

EXHIBIT B

Excerpts from the May 3, 2022 Deposition of Mr. Love

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION
CIVIL ACTION NO. 3:21-cv-03302-JMC-TJH-RMG

THE SOUTH CAROLINA STATE)
CONFERENCE OF THE NAACP,)

and)

TAIWAN SCOTT, on behalf of)
himself and all other similarly)
situated persons,)

Plaintiffs,)

v.)

HENRY D. MCMASTER, in his)
official capacity as Governor)
of South Carolina; THOMAS C.)
ALEXANDER, in his official)
capacity as President of the)
Senate; LUKE A. RANKIN, in his)
official capacity as Chairman)
of the Senate Judiciary)
Committee; JAMES H. LUCAS, in)
his official capacity as Speaker)
of the House of Representatives;)
CHRIS MURPHY, in his official)
capacity as Chairman of the)
House of Representatives)
Judiciary Committee; WALLACE)
H. JORDAN, in his official)
capacity as Chairman of the)
House of Representatives)
Elections Law Subcommittee;)
HOWARD KNAPP, in his official)
capacity as interim Executive)
Director of the South Carolina)
State Election Commission; JOHN)
WELLS, Chair, JOANNE DAY,)
CLIFFORD J. EDLER, LINDA MCCALL,)
and SCOTT MOSELEY, in their)
official capacities as members)
of the South Carolina Election)
Commission,)

Defendants.)

DEPOSITION

OF

STEVE A. LOVE

Pursuant to Rule 30 of the Federal Rules of Civil Procedure, the within deposition of **Steve A. Love** was taken by Counsel for Defendants James H. Lucas, Chris Murphy, and Wallace H. Jordan, at the hour of 10:07 a.m. on Tuesday, May 3, 2022, at the law offices of Nexsen Pruet, LLC, 1230 Main Street, Suite 700, Columbia, South Carolina, attended by counsel as follows:

**JAN L. WHITWORTH
VERBATIM REPORTER**

WHITWORTH COURT REPORTING

POST OFFICE BOX 551
ROEBUCK, S.C. 29376
864-494-2705

1 A. Excuse me?

2 Q. How were you involved?

3 A. Actually, we sued the school district, York County,
4 about redistricting.

5 Q. So, have you been involved in redistricting in any
6 other state other than South Carolina?

7 A. No, not that I recall.

8 Q. Were you involved in any in the SCNAACP's decision
9 to bring a lawsuit against the South Carolina House
10 Reapportionment Plan?

11 A. No.

12 Q. Do you know who made the decision to bring
13 litigation?

14 A. No.

15 Q. Did any person affiliated with the SCNAACP speak
16 with you about being a plaintiff in the lawsuit?

17 A. Can you say that one again? You kind of broke up.

18 Q. Let me rephrase that. Did anyone approach you about
19 being a plaintiff in this lawsuit?

20 A. No.

21 Q. Did you help identify any prospective witnesses for
22 this lawsuit?

23 A. No.

24 Q. Generally, are you familiar with the traditional
25 redistricting principles in South Carolina?

1 A. I'm not sure. You may have to explain that one to
2 me some more.

3 Q. Like, compactness, communities of interest,
4 incumbency considerations, those kind of traditional
5 redistricting principles.

6 A. Yes, yes.

7 Q. Okay. Are you familiar with the Ad-Hoc Committee's
8 redistricting guidelines and criteria?

9 A. No.

10 Q. First off, do you know who the Ad-Hoc Committee is?

11 A. I do not.

12 Q. Okay. So, did you know that the SCNAACP submitted
13 maps to the House Representatives?

14 A. Yes.

15 Q. Do you know who drew those maps?

16 A. I'm not for sure. I know the demographer John
17 Ruoff, that's -- he does most of the local maps.
18 That's who I deal with.

19 Q. Okay. Did anyone send you any maps to your personal
20 email address?

21 A. Dr. Ruoff.

22 Q. And again, you did not provide any of those maps to
23 any counsel, any attorneys?

24 A. No.

25 Q. Are you aware that there were dozens -- excuse me, a

1 dozen public hearings across the state regarding
2 redistricting?

3 A. Yes.

4 Q. Did you attend any of those public hearings?

5 A. One in York County.

6 Q. Did you provide any testimony?

7 A. No, I did not.

8 Q. Has anyone ever denied you the opportunity to
9 provide testimony regarding the Redistricting Plan.

10 A. No, not that I recall.

11 Q. All right. You were the co-chair of the SCNAACP's
12 Reapportionment Committee, right?

13 A. Yes.

14 Q. All right. How did you become the co-chair?

15 A. Actually, Brenda asked me if I would co-chair the
16 Committee.

17 Q. Do you know why she asked you?

18 A. I think she felt I had more experience because we
19 had went through redistricting there, and so, I did
20 it.

21 Q. Okay. Do you know who decided to form the
22 Reapportionment Committee?

23 A. Could you say it again; you broke up on me.

24 Q. Do you know who decided to form the Reapportionment
25 Committee?

1 A. No, I don't.

2 Q. Generally, why was a reapportionment committee
3 formed?

4 A. I'm not sure.

5 Q. Do you know generally when the Reapportionment
6 Meetings began?

7 A. I'm going to say last year, February, January,
8 February, somewhere in there.

9 Q. All right. When you were participating in these
10 meetings, were you providing any talking points or
11 scripts?

12 A. Could you explain that a little more? I mean...

13 Q. Like, you had an agenda, right?

14 A. Right.

15 Q. Well, essentially did you have like an agenda but
16 more information, you know, about those points?

17 A. From the chair, from me? That's what -- is that
18 what ---

19 Q. Yes.

20 A. No, I followed the agenda basically. I just
21 followed the agenda. I carried the meetings.

22 Q. I got you. Okay. I'm just going to ask you this:
23 from your recollection, during these meetings, did
24 anyone discuss filing litigation against the House
25 plan, the House Reapportionment Plan?

1 A. I don't recall. I mean, it could have happened. I
2 don't recall that, I mean, you know.

3 Q. All right. During those meetings, do you recall
4 ever asking the LDF or the ACLU attorneys legal
5 questions?

6 A. I may have.

7 Q. Was it your understanding that the LDF and ACLU
8 attorneys at those Reapportionment Committee
9 Meetings were the SCNAACP's attorneys?

10 A. No, general counsel I think is the NAACP's
11 attorneys.

12 Q. So, what do you think the role was for the LDF and
13 ACLU attorneys?

14 A. I'm not sure. I mean, I know it was more lawyers,
15 but I'm not sure actually.

16 Q. Do you remember at any of these meetings whether
17 asking LDF attorneys about whether or not registered
18 voters could file an injunction to stop an election?

19 A. Could you give a little bit more on that one?

20 Q. Okay. Can we -- you have the documents, right, that
21 I provided previously?

22 A. Yes.

23 Q. Okay. So, I'm going to show a document on my screen
24 ---

25 A. Okay.